

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**SHAHID BALOCH,**

**Plaintiff,**

**vs.**

**ENVISION HEALTHCARE CORP.,**

**Defendant.**

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**Civil Action No. 3:21-cv-01132-E**

**DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed R. Civ. P. 56, Defendant Envision Healthcare Corporation (“Envision”) files its Motion for Summary Judgment (“Motion”). Envision is entitled to summary judgment on Plaintiff Shahid Baloch’s (“Baloch”) causes of action against Envision for race and national origin discrimination and retaliation, in violation of Title VII of the Civil Rights Act of 1964, Texas Labor Code § 21.055 and 42 U.S.C. § 1981 as well as Baloch’s age discrimination and retaliation claims under the Age Discrimination in Employment Act of 1967. Baloch cannot prevail on his claims because he is unable to prove the reasons Envision has provided for its actions were pretext for unlawful discrimination and retaliation. Based on the undisputed facts, which are supported by Envision’s accompanying Appendix in Support of its Motion for Summary Judgment, as well as the argument and authorities set forth in Envision’s accompanying Brief in Support of its Motion for Summary Judgment, Envision therefore seeks and is entitled to judgment as a matter of law.

**RELIEF REQUESTED**

For the foregoing reasons, and as set forth more fully in the Brief and Appendix filed contemporaneously herewith pursuant to Local Rules 56.3 – 56.6, Envision respectfully requests that the Court grant the Motion; enter a take-nothing judgment for Envision and against Baloch on

each of his claims, causes of action, and requests for relief, dismissing the same with prejudice; award Envision its reasonable and necessary attorneys' fees and costs; and grant all other relief, general or special, at law or in equity, to which Envision may be justly entitled.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.**

/s/ Kristin S. Higgins

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

This is to certify that on May 25, 2022, I electronically transmitted the foregoing document to the Clerk of Court using the Court's ECF system, which will provide a Notice of Electronic Filing to all parties.

/s/ Kristin S. Higgins

Kristin S. Higgins

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